

Special Conditions

Permit Number 7711A

Emission Limitations

1. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. **(8/10)**

Fuel Specifications

2. Fuel for the facilities shall be pipeline-quality, sweet natural gas. Use of any other fuel shall require prior written approval of the Executive Director of the Texas Commission on Environmental Quality (TCEQ). **(8/10)**
3. Upon request by the Executive Director of the TCEQ, the TCEQ Regional Director, or any local air pollution control program having jurisdiction, the holder of this permit shall provide a sample and/or an analysis of the fuel utilized in these facilities or shall allow air pollution control program representatives to obtain a sample for analysis. **(8/10)**

Federal Applicability

4. These facilities shall comply with all applicable requirements of the U.S. Environmental Protection Agency (EPA) regulations on Standards of Performance for New Stationary Sources in Title 40 Code of Federal Regulations (40 CFR) Part 60 promulgated for Asphalt Processing and Asphalt Roofing Manufacture in Subpart UU, for Small Industrial-Commercial-Institutional Steam Generating Units in Subpart Dc, and with the General Provisions set forth in Subpart A. **(8/10)**
5. These facilities shall comply with all applicable requirements of the EPA regulations on National Emission Standards for Hazardous Air Pollutants for Area Sources in 40 CFR Part 63 promulgated for Asphalt Processing and Asphalt Roofing Manufacture, Subparts A and AAAAAAA. **(8/10)**

Opacity/Visible Emission Limitations

6. In accordance with the EPA Test Method (TM) 9 or equivalent, and except for those periods described in Title 30 Texas Administrative Code (30 TAC) §§ 101.201 and 101.211, opacity of emissions from the Coalescing Filter Mist Systems (Emission Point No. [EPN] CFL/34), the Electrostatic Precipitator (EPN CFL/34) when used as a back-up control device for the filter mist systems, all dust collector stacks, all process heater vents, and building vents shall not exceed 5 percent averaged over a six-minute period. **(8/10)**
7. In accordance with the U.S. EPA TM 9 or equivalent, and except for those periods described in 30 TAC §§ 101.201 and 101.211, opacity of emissions from any asphalt

storage tank exhaust gases discharged into the atmosphere shall not exceed 0 percent averaged over a six-minute period, except for one consecutive 15-minute period in any 24-hour period when the transfer lines are being blown for clearing. The control device shall not be bypassed during this 15-minute period. Opacity of emissions from any blowing still shall not exceed 0 percent averaged over a six-minute period. Opacity of emissions from any storage silo and mineral handling facility shall not exceed 1 percent averaged over a six-minute period. **(8/10)**

8. No visible emissions from the asphalt processing and asphalt roofing manufacturing operations and facilities, roads, or travel areas shall leave the property. Visible emissions shall be determined by a standard of no visible emissions exceeding 30 seconds in duration in any six-minute period as determined using the U.S. EPA TM 22 or equivalent. If this condition is violated, additional controls or process changes may be required to limit visible particulate matter (PM) emissions. Stack emissions may leave the plant property provided that opacity restrictions are not violated. **(8/10)**

Operational Limitations, Work Practices, and Plant Design

9. The company has represented the following to comply with all TCEQ rules and regulations:
 - A. The Standby Boiler (EPN BLR5) shall be limited to a maximum fuel consumption of 18.02 million standard cubic feet per year. **(1/12)**
 - B. All filler and backing material shall be received and transferred within the building with no visible emissions leaving the building. **(8/10)**
 - C. The emissions from Stillyard Asphalt Storage Tank Nos. T-1, T-2, T-8, T-9, T-10, T-14, T-15, T-110, and T-120; from Blowing Stills T-13 and T-26; from truck and railcar loading and unloading operations; and from the self-seal asphalt storage tank shall be vented to the direct-flame incinerator. **(8/10)**
 - D. Upon issuance of the amended permit, the direct-flame incinerator shall be operated at an average incineration temperature of 1450°F measured immediately downstream of the incinerator, based on a one-hour averaging period, during normal operations. Normal operations are herein defined as any time period when asphalt blowing is occurring, and emissions from the blowing are vented to the direct-flame incinerator. The direct-flame incinerator shall be operated at a minimum incineration temperature of 1300°F during Standby Operating Conditions to assure compliance with the maximum allowable emission rates table (MAERT) limits for volatile organic compounds (VOC) from EPN 8/8A. Standby operating conditions are herein defined as when no process blowers are in operation on any blowing still venting to the direct-flame incinerator. **(8/10)**

- E. After issuance of the amended permit, the permit holder is allowed to conduct stack sampling of the direct-flame incinerator during normal operations at an average temperature lower than 1450°F to demonstrate compliance with the MAERT limits for VOC from EPN 8/8A. Upon demonstration of compliance with the MAERT limits for VOC, the permit holder shall submit a permit action to modify the temperature requirement of the direct-flame incinerator during Normal Operations. **(8/10)**
 - F. The maximum allowable asphalt throughput rates are 32,063 pounds per hour for Line 1 and 53,438 pounds per hour for Line 3. **(8/10)**
 - G. The maximum allowable production rates for both Line 1 and Line 3, combined, are 171 tons per hour and 1,498,000 tons per year of finished shingles. **(8/10)**
- 10. An opacity violation or an odor nuisance condition, as confirmed by the TCEQ or any local air pollution control program with jurisdiction, may be cause for additional controls. If the nuisance condition persists, subsequent stack sampling may also be required.
 - 11. All in-plant roads and areas subject to road vehicle traffic shall be paved with a cohesive hard surface and cleaned, as necessary, to maintain compliance with the TCEQ rules and regulations. Unpaved work areas shall be sprayed with water and/or environmentally sensitive chemicals upon detection of visible PM emissions to maintain compliance with all TCEQ rules and regulations.
 - 12. All stacks associated with the Line 1 Cooling Section (EPN COOL1) shall be no less than 64 feet measured from ground level. All stacks associated with the Line 3 Cooling Section (EPN COOL3) shall be no less than 73 feet measured from ground level. **(8/10)**
 - 13. There shall be no changes in representations unless the permit is altered or amended. **(8/10)**

Continuous Determination of Compliance

- 14. Upon being informed by the TCEQ Executive Director that the staff has documented visible emissions that exceed the specified opacity limits, the holder of this permit may be required to conduct stack sampling analyses or other tests to prove satisfactory abatement or process equipment performance and demonstrate compliance with the PM and VOC allowable emissions specified in the MAERT. Sampling must be conducted in accordance with appropriate procedures of the TCEQ Sampling Procedures Manual and in accordance with applicable EPA CFR procedures. Any deviations from those procedures must be approved by the TCEQ Executive Director prior to sampling. **(8/10)**
- 15. The TCEQ Executive Director may require the permit holder to perform stack sampling or ambient air monitoring to determine the opacity, rate, composition, and/or concentration of the plant's emissions. The holder of this permit may request the TCEQ Executive Director

to approve alternate sampling techniques or other means to determine the opacity, rates, composition, and/or concentration of emissions in accordance with 30 TAC § 101.8. **(8/10)**

16. All stack sampling shall be conducted within 60 days of being informed that testing is required, and it shall meet all requirements specified in the Sampling Requirements section of this permit's special conditions. **(8/10)**
17. For any asphalt storage tank and storage silo and mineral handling facility, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If the result of the Test Method 9 is opacity above the corresponding opacity limit, the permit holder shall report a deviation. **(8/10)**
18. For any blowing still, visible emissions observations shall be made and recorded once per week. Note that to properly determine the presence of visible emissions, all sources must be in clear view of the observer. The observer shall be at least 15 feet, but not more than 0.25 mile, away from the emission source during the observation. The observer shall select a position where the sun is not directly in the observer's eyes. If the observations cannot be conducted due to weather conditions, the date, time, and specific weather conditions shall be recorded. When condensed water vapor is present within the plume, as it emerges from the emissions outlet, observations must be made beyond the point in the plume at which condensed water vapor is no longer visible. When water vapor within the plume condenses and becomes visible at a distance from the emissions outlet, the observation shall be evaluated at the outlet prior to condensation of water vapor. If visible emissions are observed, the permit holder shall report a deviation. As an alternative, the permit holder may determine the opacity consistent with Test Method 9, as soon as practicable, but no later than 24 hours after observing visible emissions. If a Test Method 9 is performed, the opacity limit is the corresponding opacity limit associated with the particulate matter standard in the underlying requirement. If there is no corresponding opacity limit in the underlying applicable requirement, the maximum opacity will be established using the most recent performance test. If the result of the Test Method 9 is opacity above the corresponding opacity limit (associated with the particulate matter standard in the underlying applicable requirement or as identified as a result of a previous

performance test to establish the maximum opacity limit), the permit holder shall report a deviation. **(8/10)**

19. The temperature in the combustion chamber or immediately downstream of the combustion chamber of the direct-flame incinerator shall be measured and recorded four times per hour with an averaging period of one hour. The permit holder shall establish a minimum combustion temperature using the most recent performance test, manufacturer's recommendations, engineering calculations, and/or historical data. The monitoring instrumentation shall be maintained, calibrated, and operated in accordance with manufacturer's specifications or other written procedures. Any monitoring data below the minimum limit shall be considered and reported as a deviation. **(8/10)**

Sampling Requirements

20. The holder of this permit is responsible for providing sampling and testing facilities and conducting the sampling and testing operations at his expense. Sampling ports and platforms shall be installed on the exhaust stack according to the specifications set forth in the attachment entitled "Chapter 2, Stack Sampling Facilities" prior to stack sampling. Alternate sampling facility designs may be submitted for approval by the TCEQ Executive Director.
21. The plant shall operate at the maximum shingle production and raw material throughput rates and operating parameters, represented in the confidential file, during stack emissions testing being conducted for continuing compliance demonstrations. If the plant is unable to operate at the maximum rates during compliance testing, then the production/throughput rates or other parameters may be limited to the rates established during testing. If stack testing was not accomplished at the maximum production/throughput rates, then such testing may be required prior to actual operations at the maximum rates. **(8/10)**
22. A pretest meeting concerning any required stack sampling and/or ambient air monitoring shall be held with personnel from the appropriate TCEQ Regional Office before the required tests are performed. Air contaminants to be tested for and the test methods to be used shall be determined at this pretest meeting.

The TCEQ Regional Office shall be notified no less than 45 days prior to sampling to schedule a pretest meeting. The notice to the TCEQ Regional Office shall include:

- A. Date for pretest meeting;
- B. Date sampling will occur;
- C. Name of firm conducting sampling;
- D. Type of sampling equipment to be used; and
- E. Method or procedure to be used in sampling.

The purpose of the pretest meeting is to review the necessary sampling and testing procedures, to provide the proper data forms for recording pertinent data, and to review the format procedures for submitting the test results.

23. Air contaminants to be tested for may include (but are not limited to) PM, CO, SO₂, NO_x, and VOC.
24. A written proposed description of any deviation from sampling procedures specified in permit conditions or TCEQ or EPA sampling procedures shall be made available to the TCEQ prior to the pretest meeting. The TCEQ Regional Office shall approve or disapprove of any deviation from specified sampling procedures.
25. The sampling report shall include the following: **(8/10)**
 - A. Plant production and throughput rates during tests; and
 - B. Direct-flame incinerator operating temperature during tests.
26. Copies of the final sampling report shall be submitted within 30 days after sampling is completed. Sampling reports shall comply with the provisions of Chapter 14 of the TCEQ Sampling Procedures Manual. The reports shall be distributed as follows: **(8/10)**

One copy to the TCEQ Dallas/Fort Worth Regional Office; and
One copy to each appropriate local air pollution control program.
27. Requests to waive testing for any pollutant specified in the above special conditions shall be submitted to the TCEQ Office of Air, Air Permits Division.

Recordkeeping Requirements

28. In addition to the recordkeeping requirements specified in General Condition No. 7, 40 CFR Part 60, Subparts A, Dc, and UU, and 40 CFR Part 63, Subparts A and AAAAAAA, the following records shall be kept and maintained on-site for a rolling 60-month period: **(1/12)**
 - A. Records of the exhaust gas temperature immediately downstream of the direct-flame incinerator to demonstrate compliance with 30 TAC § 115.126(1)(A)(i). These records shall be maintained on-site for at least five years;
 - B. Records of either VOC concentration or mass emission rate of each vent gas stream for the Line 1 and Line 3 Cooling Sections at maximum actual operating conditions to demonstrate compliance with 30 TAC § 115.126(4). These records shall be maintained on-site for at least five years;
 - C. Hourly asphalt throughput rates for Line 1 and for Line 3;

- D. Combined Line 1 and Line 3 hourly and annual production rates of finished shingles;
- E. Annual fuel consumption for the Standby Boiler (EPN BLR5);
- F. Records of asphalt stored and used, that have the potential to emit Hazardous Air Pollutants [HAP], shall be kept in sufficient detail in order to allow all required emission rates to be fully and accurately calculated. Using this recorded data, a report shall be produced for the emission of HAPs (in tons per year) over the previous 12 consecutive months;
- G. Records of repairs and maintenance of all pollution abatement equipment;
- H. Records of road cleaning, application of road dust control, or road maintenance for dust control; and
- I. All monitoring data and support information as specified in 30 TAC § 122.144.

Dated: January 20, 2012